

# Frankfurt Kurnit Klein+Selz PC

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June 2, 2023

**VIA ECF**

Honorable P. Kevin Castel  
United States District Court  
Southern District of New York  
500 Pearl Street  
New York, New York 10007

RE: Roberto Mata v. Avianca, Inc No.: 22-cv-1461 (PKC)

Dear Judge Castel:

We represent Steven A. Schwartz and Levidow, Levidow & Oberman, P.C. (the “Firm”). We write jointly with counsel for Peter LoDuca in connection with the Order to Show Cause dated May 26, 2023. (Docket Entry No. 33, the “OSC”). The OSC directs Mr. Schwartz, Mr. LoDuca and the Firm to identify any live witnesses that they wish to call at the June 8, 2023 hearing.

Although we expect that our June 6, 2023 submissions will address the main factual issues in the OSC, in an abundance of caution, Mr. Schwartz, Mr. LoDuca and the Firm intend to make the following individuals available to present testimony on the issues relevant to the OSC and to answer any questions that the Court may have:

- Steven A. Schwartz, Esq.
- Thomas Corvino, Esq.
- Peter LoDuca, Esq.

Respectfully submitted,

/s/ Tyler Maulsby

Tyler Maulsby

cc: All Counsel (via ECF)